

BEFORE THE INVESTIGATIVE PANEL OF THE
FLORIDA JUDICIAL QUALIFICATIONS COMMISSION
STATE OF FLORIDA

INQUIRY CONCERNING A JUDGE

SC13-1333

LAURA MARIE WATSON, NO. 12-613

**OBJECTION TO JUDGE WATSON'S NOTICE TO PRODUCE AT TRIAL DATED
FEBRUARY 5, 2014**

The JQC, through counsel, objects to Judge Watson's Notice to Produce at Trial served upon the JQC on February 5, 2014, and says:

1. Judge Watson requests that the JQC produce certain materials as set forth in that Request to Produce at Trial. The items requested are privileged, confidential and work-product of the undersigned.

2. The JQC has fully complied with all of Judge Watson's previous requests for production as required by the Florida Judicial Qualifications Commission Rules.

3. Specifically, FJQCR Rule 12 (b) provides:

Special Counsel shall, upon written demand of a party or counsel of record, promptly furnish the following:

The names and addresses of all witnesses whose testimony the Special Counsel expects to call at the hearing, together with copies of all written statements and transcripts of testimony of such witnesses in the possession of the counsel or the Investigative Panel which are relevant to the subject matter of the hearing and which have not been furnished, except those documents confidential under the Constitution of the State. When good cause is shown this rule may be waived.

4. Special Counsel has previously responded to the appropriate requests made and on behalf of Judge Watson. The propriety of that production has previously been argued before the chair of the hearing panel and the JQC has been sustained in its position.

5. Accordingly, the JQC objects to Judge Watson's Notice to Produce at Trial.

DATED this 7th day of February, 2014.

Respectfully submitted,

/s/ Ruben V. Chavez

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic service, this 7th day of February, 2014 to:

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By: /s/ Ruben V. Chavez
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